

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil No.
	:	
\$6,056.00 IN UNITED STATES CURRENCY,	:	
	:	
Defendants	:	
	:	
[CLAIMANT: JORDAN JAMISON]	:	September 6, 2019

VERIFIED COMPLAINT OF FORFEITURE

Now comes Plaintiff, United States of America, by and through its attorneys, John H. Durham, United States Attorney for the District of Connecticut, and David C. Nelson, Assistant United States Attorney, and respectfully states that:

1. This is a civil action in rem brought to enforce the provision of 21 U.S.C. § 881(a)(6), which provides for the forfeiture of proceeds traceable to the exchange of controlled substances in violation of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq.
2. This Court has jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1335. Venue is appropriate in the District of Connecticut by virtue of 28 U.S.C. § 1395(b).
3. The Defendant is \$6,056.00 in United States Currency (“Defendant Currency”).
4. The Defendant Currency is located within the jurisdiction of this Court.
5. On June 10, 2019, Jordan Jamison submitted an administrative claim of ownership to the Defendant Currency.

Background of Investigation

6. Late in 2018, law enforcement began an investigation of a heroin and cocaine drug trafficking organization (“DTO”) based out of Waterbury, Connecticut led by an individual named Keith Jordan (“Jordan”).

7. Numerous court authorized Title III intercepts of Jordan’s telephone, and surveilled narcotics transactions, determined that an individual named Carlos Morais (“Morais”) was a major narcotics distributor and co-conspirator to the Jordan DTO. Law enforcement subsequently applied for and received authorization to intercept calls from a telephone utilized by Morais.

8. During the intercepts of Morais’ telephone, law enforcement learned that an individual named Jordan Jamison (“Jamison”) was a frequent customer of Morais. Morais and Jamison’s telephone conversations were intercepted by law enforcement as the two were coordinating multiple heroin and cocaine transactions in Waterbury, CT during November and December of 2018. Prior to the Title III intercepts between Morais and Jamison, law enforcement was aware of Jamison and his drug trafficking activities as they had used a confidential source to effectuate controlled purchases of heroin from him.

9. Based upon the information received from these intercepted telephone calls, law enforcement was able to conduct surveillance of a number of the planned “meet ups.” Law enforcement was also able to positively identify Jamison further as a result of these surveilled meetings.

10. On March 20, 2019, law enforcement executed federal arrest, search and seizure warrants on 29 members of the DTO including the residence of Jordan Jamison at 18 Hunthill Road, Waterbury, CT.

11. Jamison was arrested and charged with the following federal narcotics violations: Conspiracy to Distribute and to Possess with the Intent to Distribute, Heroin, Cocaine and Cocaine Base; and Possession with the Intent to Distribute and Distribution of Heroin. Law enforcement attempted to interview Jamison after his arrest but he refused to speak to officers so the questions were terminated immediately.

12. Incident to his arrest, law enforcement conducted a consented to search of Jamison's residence at 18 Hunthill Road. Law enforcement located and seized eight bundles (65 bags) of heroin located in a pillowcase, which was hidden inside of a plastic bin. Law enforcement also seized \$6,056.00 in United States Currency. The currency was located in the following locations throughout the residence: in the same pillowcase that contained the 65 bags of heroin; inside of a sneaker found in the bedroom closet; and from inside the pocket of a jacket located in the bedroom.

13. In March of 2019, law enforcement ran a State of Connecticut Department of Labor check on Jamison, which showed that he had no reported income for the previous 16 quarters.

14. Based on the above information, it is believed that \$6,056.00 in United States Currency constitutes proceeds from the illegal sale and distribution of narcotics and is therefore subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

15. The Defendant Currency represents proceeds traceable to the exchange of controlled substances in violation of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq., and are, therefore, subject to forfeiture to the United States of America pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that Warrants of Arrest In Rem be issued for \$6,056.00 in United States Currency; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

JOHN H. DURHAM
UNITED STATES ATTORNEY

/s/ John B. Hughes
JOHN B. HUGHES
CHIEF, CIVIL DIVISION
ASSISTANT U. S. ATTORNEY

/s/ David C. Nelson
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DECLARATION

I am a Task Force Officer for the United States Drug Enforcement Administration, and the agent assigned the responsibility for this case.

I have reviewed the contents of the foregoing Verified Complaint of Forfeiture and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of September, 2019.

/s/ Michael Paleski
MICHAEL PALESKI
TASK FORCE OFFICER
U.S. DRUG ENFORCEMENT ADMINISTRATION